

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

23-CV-07942-JHR

CHAPTER 11

307 ASSETS LLC,

Bankruptcy Case No:23-10027(JPM)

Debtor.

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**DESIGNATION**

SEI INSIEME LLC,

PLAINTIFF/APPELLANT

v.

307 ASSETS LLC,

DEFENDANT/APPELLANT

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**APPELLANT SEI INSIEME LLC'S STATEMENT OF ISSUES AND DESIGNATION OF  
RECORD ON APPEAL FROM THE FINAL ORDER DISMISSING DEBTOR'S CASE**

SEI INSIEME LLC ("Appellant"), by and through its counsel, respectfully submits this designation of record and issues in furtherance of its appeal under 28 U.S.C. §158(a) from the final order entered in the bankruptcy filed in the Southern District of New York case number 23-10027 (JPM) Doc. No. 70, entitled "Order Confirming Chapter 11 Plan"

In accordance with the requirements of Federal Rule of Bankruptcy Procedure 8009, Appellant respectfully submits the following statement of issues to be presented, and designation of record items to be included in the record on appeal in connection with this appeal.

**ISSUES ON APPEAL**

1. Whether the Bankruptcy Court erred in confirming the proposed Plan of Reorganization of 307 Assets LLC (the "Debtor") dated March 30, 2023 [Doc. No. 33].

2. Whether the Bankruptcy Court erred in determining the sale of the Debtor's property located at 307-309 Sixth Avenue, New York NY 10022 (the "Property"), was an arms-length transaction, non-collusive, fair and reasonable and conducted openly and in good faith.
3. Whether the Bankruptcy Court erred in determining the purchaser of the Property was a good faith purchaser within the meaning of 11 U.S.C. §363(m).
4. Whether the Bankruptcy Court erred in determining the purchaser of the Property was not controlled by an agreement among potential purchasers in violation of 11 U.S.C. §363(n).
5. Whether the Bankruptcy Court erred in determining the requirements for confirmation of the plan set forth in 11 U.S.C. §1129 were satisfied.

**DESIGNATION OF RECORD ON APPEAL**

Appellant designates:

- a. Documents set forth on attached Exhibit **A** the documents filed in the bankruptcy case including any and all exhibits and documents annexed to and referenced within such items and transcripts of hearings ordered pursuant to Federal Rule of Bankruptcy Procedure 8009;
- b. Attached hereto as Exhibit **B** is a copy of the notice of appeal with the order being appealed from.

Dated: Harrison, NY  
September 18, 2023

BRONSON LAW OFFICES P.C.

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